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UNITED STATES POSTAL INSPECTION SERVICE

I, DYLAN LOUIS, DO HEREBY DEPOSE AND SAY:

- 1. I am a United States Postal Inspector and have been so employed since January of 2024. I am presently assigned to the U.S. Postal Inspection Service (USPIS) Cleveland, Ohio Field Office's Contraband Interdictions and Investigations group, which strives to protect the U.S. Mail from dangerous drugs and illegal contraband, specifically illicit drugs and firearms. I have received training in the detection and investigation of drug trafficking, and in May of 2024, I completed a 16-week Basic Inspector Training program where I received training in the detection and investigation of prohibited mailing offenses.
- 2. Because this affidavit is submitted for the limited purpose of supporting a search warrant, I have not included every fact known concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause that the below referenced U.S. Postal Service (USPS) parcel contains a controlled substance.
- 3. On February 19, 2025, while reviewing Postal Service electronic databases, I identified U.S. Postal Service parcel bearing tracking number 9505516954215049072432 addressed to Larry Dusenbery at 340 E Summit Street, Apt D, in Kent, OH 44240 and bearing the return address of 1338 Mining Ridge Ch. Rd. in Elkin, NC 28621 (hereinafter "the Subject Parcel"). A sender name was absent from the parcel.
- 4. I identified the Subject Parcel as a suspected drug parcel based on several factors including, but not limited to, postage tender, method of mailing, and size. On February 23, 2025, I took possession of the Subject Parcel at the USPS Akron Wolf Ledges Processing and Distribution Center and transported it to the USPIS Cleveland, Ohio Field Office for further investigation.
- 5. The Subject Parcel is described as a Priority Mail parcel packaged in a red and white Priority Mail Flat-Rate Envelope. The Subject Parcel measures approximately 12.5" x 9.5", weighs approximately 3 ounces, and bears \$10.10 in cash-paid postage. The Subject Parcel was mailed from Ronda, NC 28670 on February 18, 2025.
- 6. I know based on training and experience that U.S. Mail is often used by drug traffickers to transport controlled substances as well as U.S. currency derived from their illicit activities, either as proceeds and/or payment. I know based on training and experience that Priority Mail parcels are commonly used to transport controlled substances and associated currency because it provides traceability, reliability, and timely delivery. Also, the expedited delivery time of Priority Mail parcels places time pressures on law enforcement agents to identify, search, and deliver such parcels in a timely manner. Furthermore, I know based on training and experience that individuals utilizing the USPS for the shipment of controlled substances and their proceeds will often purchase postage in cash as a means of anonymizing the mailing of the parcel.

- 7. In furtherance of the investigation, I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, and I was able to associate a Larry Dusenbery at 340 E Summit Street, Apt D, in Kent, OH 44240. However, on February 21, 2025, Larry Dusenbery was arrested by USPIS for attempted possession with intent to distribute methamphetamine.
- 8. According to CLEAR, the address of 1338 Mining Ridge Ch. Rd. in Elkin, NC 28621 is a legitimate address; however, a return sender name was not included on the Subject Parcel. I know based on training and experience that individuals using the U.S. Mail for the purpose of transporting controlled substances will often place fictitious addresses and/or name information, different variations of their names, names of deceased individuals, or no names at all on these parcels to conceal their true identities from law enforcement, should the parcel be seized.
- 9. On February 24, 2025, the Subject Parcel was placed into a lineup containing several blank parcels which emanated no narcotics odors. Narcotics detection canine "Atilla," handled by Detective Michael Twombly of the Cuyahoga County Sheriff's Office, was allowed to examine the lineup. According to Detective Twombly, Atilla gave a positive alert to the Subject Parcel and did not give a positive alert on the blank parcels. According to Detective Twombly, this positive alert meant Atilla detected the odor of an illegal drug emanating from the Subject Parcel.
- 10. Detective Twombly has been state certified as a narcotics canine handler since 2005, and he and narcotics canine Atilla have worked together since July of 2022. Detective Twombly and canine Atilla completed 240 hours of a state-certified training program at Excel K-9 Services, Inc., in Hiram, Ohio, under Certified Master Trainer Paul Shaughnessy of the North American Police Work Dog Association (NAPWDA), a nationally organized police work dog association which provides training for dogs and handlers. Detective Twombly and canine Atilla were both certified in June of 2024 by the Ohio Peace Officers Training Academy (OPOTA) and the North American Police Work Dog Association (NAPWDA).
- 11. Canine Atilla has been trained to detect the presence of the odors of the following controlled substances: marijuana, cocaine, heroin, methamphetamine ("crystal meth"), and/or their derivatives. Prior to handling canine Atilla, Detective Twombly handled canine Ciga for 9 years, and he and canine Ciga completed 80 hours of a state-certified training program at Shallow Creek Kennels in Sharpsville, Pennsylvania under Certified Trainer John Brannon of the NAAPWDA, a nationally organized police work dog association that provides training for dogs and handlers. Detective Twombly has been trained how to handle a detector canine and read his alerts.

12. Based on the information contained herein, I maintain there will be probable cause to believe that U.S Postal Service Priority Mail parcel bearing tracking number 9505516954215049072432 addressed to Larry Dusenbery at 340 E Summit Street, Apt D, in Kent, OH 44240 and bearing the return address of 1338 Mining Ridge Ch. Rd. in Elkin, NC 28621 contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

DYLAN LOUIS

U.S. POSTAL INSPECTOR

This affidavit was sworn to by the affiant, who attested to its contents by telephone, pursuant to Crim. R. 4.1 (b)(2)(A), after a PDF was transmitted by email, per Crim R. 4.1(d)(3), this 27th day of February, 2025.

AMANDA M. KNAPP

U.S. MAGISTRATE JUDGE